

# Lakeland Communications

## Privacy Policy

**Last Updated: August 16, 2021**

Lakeland Communications Group, LLC (“**Lakeland Communications**” or “**us**” or “**we**” or “**our**”) value and respect the privacy of our customers and users of our websites and mobile applications, and are committed to protecting your privacy.

### Scope

The privacy policy and practices set forth herein (“**Privacy Policy**”) covers the information generated when you use or subscribe to one or more of our services, products, websites or mobile applications. By subscribing to our services, purchasing our products, communicating with us, submitting information to us, or accessing our websites, or using our mobile applications, you agree to Lakeland Communications’ collection and use of your information as described in this Privacy Policy.

This Privacy Policy does not apply to information that may be collected by others through their services or websites, even if you purchase their services or products from us or access them through our services or websites. We are not responsible for the practices of others. We encourage you to review the privacy policies and practices that apply to other services and websites to learn how the providers handle your Personal Information.

### Collection of Personal Information

Lakeland Communications may collect Personal Information about you for the purposes specified in this Privacy Policy, and as otherwise permitted by law. “**Personal Information**” is information that directly identifies or reasonably can be used to determine the identity of a customer or user. Personal Information includes, without limitation, your name, service address, billing address, e-mail address, telephone number, social security number, driver's license number, credit card number, bank account number, credit information, and other similar information. We may also collect and maintain certain other information about your account. For example, this information may include billing, payment and deposit history; service and product related information; customer correspondence and communications; and maintenance and complaint information.

Information You Give Us. Lakeland Communications collects Personal Information you enter on our websites or provide to us in any way. For example, you provide information when you order a service or product from us, when you communicate with us by phone, e-mail, or otherwise, when you use our mobile applications, when you establish an account with us, and when you respond to our questions or surveys.

Information Obtained Through Lakeland Communications’ Mobile Applications. Lakeland Communications may collect Personal Information through mobile applications. Specifically, this information includes:

- Your name, email address, location, phone number.
- Browser information and session cookies related to your access and use of the App.
- Data insights Lakeland Communications Inc. attains based on correlation and analytics of your information collected in providing the App, which may be used in aggregated and dis-aggregated formats or to obtain trend analytics, to provide the App; and
- Use of the above-described collected information in aggregated and dis-aggregated formats to enhance our current App or to provide App features.

Automatic Information. As part of network operations, we receive and store certain types of information whenever you interact with us. We may do so by transferring cookies, web beacons, and/or other similar technologies to your device (“**Trackers**”). These Trackers enable our system to recognize your device and to personalize your service by collecting and storing information that will identify you when you visit our websites. These Trackers also allow us to collect website usage information when you visit our websites including, without limitation, your domain type, information that identifies the devices connected to the Internet through our Internet service, such as any IP address assigned to the connection and the MAC addresses in use, web browser and operating system types, web pages visited on our websites, time spent on our web pages, and return visits to our websites and other click stream information. We collect this information to gauge the effectiveness of our websites, improve our online operations, enhance your online experience with customized content, and focus our marketing efforts to better meet the needs of our customers. We may also collect connection performance information, amount of bandwidth used, and times and dates of connection to help us manage our network and the services we provide, and to improve the services we offer. We also collect certain information from emails that pass through our email server, such as the time stamp, to and from addresses, the subject line, the IP address, and the email protocol used. This information is used to respond to customer inquiries and comply with subpoenas, search warrants, and court orders.

The Help feature on most browsers will tell you how to prevent your browser from accepting new Trackers, how to have the browser notify you when you receive a new Tracker, or how to disable Trackers altogether. However, if you do not accept or disable our Trackers, you may limit your experience on our website. For example, you may be unable to find pricing and availability of services and products in your area from our websites.

## **Other Privacy Information**

Information Specific to Children. We are committed to protecting children’s privacy on the Internet. In order to protect the privacy of children online, Lakeland Communications does not knowingly collect, maintain or process Personal Information from any person under the age of 13.

Customer Proprietary Network Information (CPNI). CPNI includes information about your use of the telecommunications services provided by Lakeland Communications, such as the type and quantity of the telecommunications services you subscribe to and other details about your calling including the telephone numbers called; the telephone numbers from which you receive a call; the frequency, duration, timing and location of telephone calls. CPNI does not include your name, address, and telephone number. Lakeland Communications uses CPNI as permitted by federal law.

## **Use of Personal Information**

We may use the information collected to:

- install, operate, provide, maintain, and manage our services,
- confirm you are receiving the level(s) of service requested,
- initiate, render, bill, and collect for services and products provided to you,
- notify you when changes are made to your account or services,
- communicate with you to maintain good customer relations,
- inform you of new services and products that may be of interest to you,
- provide you with information you requested,
- personalize the content we deliver,
- understand the use of, and identify improvements to, our services,
- conduct industry or consumer surveys,

- manage, improve and troubleshoot our network and services,
- determine the effectiveness of our websites and improve our online operations,
- focus our marketing efforts to better meet the needs of our customers,
- conduct a legitimate business activity related to our services,
- determine whether applicable policies and terms of service are being violated,
- enforce our Website Terms of Use and agreements between you and Lakeland Communications,
- carry out Lakeland Communications' obligations as described or authorized in any applicable agreement and this Privacy Policy,
- provide you with Lakeland Communications' mobile applications, including as described in any applicable agreement,
- implement, improve and/or enhance Lakeland Communications' mobile applications, including to make future releases available to you,
- fulfill any other purpose authorized by you and reasonably required for a Lakeland Communications' mobile application,
- protect the safety and security of customers or members of the public,
- act in emergency or exigent circumstances,
- protect against fraud or for risk management purposes,
- detect unauthorized reception of our services,
- comply with federal and state regulatory requirements
- comply with the law or legal process such as a subpoena, search warrant, or court order, or
- for any purpose otherwise permitted or required by law.

## **Sharing of Personal Information**

Lakeland Communications considers your Personal Information to be confidential. Except as described in this Privacy Policy, we will not disclose your Personal Information outside of Lakeland Communications, its affiliates, or its authorized agents without your consent.

With your consent, your Personal Information may be shared with affiliates and third parties for the purposes of marketing our services and products. Depending on the circumstance, notice and opt-out may be a permissible means of obtaining your consent. Affiliates and third parties are permitted to obtain only the Personal Information they need and are prohibited from using it for any purpose other than those permitted by law or with your consent.

We may share Personal Information for purposes permitted or required by law without your consent such as to provide or conduct a legitimate business activity related to our services (e.g., to help initiate, render, bill, and collect for services and products provided to you).

There may be instances when we disclose Personal Information without notice or your consent in order to: (i) protect or defend the legal rights or property of Lakeland Communications and our affiliates, customers, employees and agents, including enforcement of our agreements (e.g., we may sell past-due accounts receivable in an effort to collect for unpaid services); (ii) protect the safety and security of customers or members of the public including acting in emergency or exigent circumstances; (iii) protect against fraud or for risk management purposes; or (iv) comply with the law or legal process such as a subpoena, search warrant, or court order.

In addition, if Lakeland Communications sells all or part of its business or makes a sale or transfer of all or a material part of its assets or is otherwise involved in a merger or transfer of all or a material part of its business, Lakeland Communications may transfer your Personal Information to the party or parties involved in the transaction as part of that transaction.

## **Accessing your Personal Information**

Lakeland Communications takes reasonable measures to assure that the Personal Information we use is accurate, complete, and up-to-date. We make good faith efforts to provide you with access to your Personal Information either to correct this data if it is inaccurate or to delete such data at your request if it is not otherwise required to be retained by law or for legitimate business purposes. Subject to our policies and procedures, you have the ability to authorize individuals to make inquiries, limited changes, or both, to your Personal Information.

If you desire to review and/or edit your Personal Information, you may do so by contacting us at the number provided on your billing statement. We may decline to process requests for Personal Information that are unreasonably repetitive or systematic, require disproportionate technical effort, jeopardize the privacy of others, or would be impractical (for instance, requests concerning information residing on backup systems). We provide Personal Information access and correction free of charge, except if doing so would require a disproportionate effort, in which case we reserve the right to charge you for the cost.

## **Security of your Personal Information**

Lakeland Communications will take reasonable security safeguards to help ensure the safety of your Personal Information. However, no security safeguards are 100% effective. As a result, we cannot guarantee that we will prevent every unauthorized attempt to access, use or disclose your Personal Information.

## **Changes to this Privacy Policy**

We will occasionally update this Privacy Policy to reflect changes in our privacy policies and practices. When we post changes to this Privacy Policy, we will revise the "last updated" date at the top of this Privacy Policy. We encourage you to periodically review this Privacy Policy to be kept informed about Lakeland Communications' privacy policies and practices.

## **Contacting Us**

Lakeland Communications welcomes your comments regarding this Privacy Policy. If you have questions about this Privacy Policy or believe that we have not adhered to it, please contact us by mail, email or telephone:

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